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April 20, 2017

Marlene Dortch

Secretary

Federal Communications Commission

445 Twelfth Street, SW

Washington, DC 20554

RE: Notice of Ex Parte, PS Docket No. 17-68

Dear Ms. Dortch:

This letter is follow up to an ex parte phone call held on April 17, 2017 to discuss the nationwide 9-1-1 outage experienced by AT&T on March 8, 2017 and the FCC mandated reporting process. Present on the call were, from the FCC (PSHSB) James Wiley, Megan Henry, Tyler Di Mattia, and Jeffrey Goldthorp. I, Dana Wahlberg State of MN 9-1-1 Program Manager represented MN PSAPs on the call.

In MN, some PSAPs were notified by the Comtech NOC at 2012 hours CST with an ambiguous email stating Comtech has identified a potential impairment affecting your PSAP stating AT&T calls may be impacted. It noted the incident start at 1352 hours PST (5 hours prior to the notification). By the time I received notification via the Comtech NOC at 2116 hours CST, the incident was reportedly as having ended at 1853 hours PST with "the impairment resolved and all traffic processing normally".

Although I am confident the FCC mandated reporting process is well-intended, our experiences with it in MN have been extremely challenging. The notifications are not timely, they are not consistently reaching the correct people, and they are extremely vague. PSAP notification in real time of a single carrier experiencing an issue creates more problems than it solves. There needs to be a balance between timely notification and reliable notification. In the case of the AT&T outage, we had neither.

The notifications as they are currently happening are causing great confusion and are not helpful to the PSAP. MN PSAPs are extremely hesitant to provide public notification, and especially without having succinct information as to the scope of an outage. Furthermore, when an outage is limited to one carrier and 9-1-1 network is functioning normally, notification can be misleading to the public and put the entire 9-1-1 system at risk by causing people to generate "test" calls to see if the system is working.

In Minnesota, we have attempted to distribute a currently updated contact list to all carriers and VPCs quarterly. In some cases, our list is refused, stating there is a requirement of the carriers to obtain the information from every individual PSAP. In other cases it is refused noting there is a specific application in which it must be entered. Carriers' constant efforts to maintain a current PSAP contact list requires significant PSAP resources and frequently leads to inaccurate information depending on who in the PSAP receives the request for updated information. PSAPs often will not respond to individual requests, out of concern they may be spam, or for fear they may be illegitimate in nature. Some PSAPs simply do not have staff to fulfill repeated requests from carriers and VPCs. It would be very useful if there was a single database repository that could be maintained that all carriers and VPCs could access.

Finally, the FCC, 9-1-1 service providers, 9-1-1 authorities, and PSAPs should reach an agreement on what circumstances warrant a notification. Subsequently, in an outage, it should be the 9-1-1 service provider(s) in each state who should be notified and be responsible for alerting the affected PSAPs and assisting in the public notification process. Taking an active role in managing and providing public information on every type of outage is really outside the scope of responsibility of every individual PSAP.

A copy of this ex parte notification is being filed in the above-referenced docket.

I am willing to make myself available for further discussion in this matter. Thank you to the FCC (PSHSB) for seeking comment regarding this process.

Sincerely,

A handwritten signature in black ink, appearing to read "Dana Wahlberg". The signature is fluid and cursive, with the first name "Dana" being more prominent and the last name "Wahlberg" following in a similar style.

Dana Wahlberg
State of Minnesota 9-1-1 Program Manager